

Exhibit 16

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September 30, 2015

Via e-mail - afaes@wcllp.com

*ATTORNEY WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL*

Andrew N. Faes, Esquire
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4740 Grand Avenue, Suite 300
Kansas City, MO 64112

RE: *In re: Ethicon, Inc. Pelvic Repair System
Products Liability Litigation*

Dear Andy:

This is in response to your letter of September 23, 2015. In that letter you agreed to meet and confer regarding a potential narrowing of the scope of topics 1 & 2 but otherwise were unwilling to narrow the scope of the notice. We previously raised our concerns with this notice in past meet and confers and in my August 5, 2015 letter to you. Because the parties cannot reach agreement on this issue, we will be raising it before Judge Eifert in early October. We will serve our motion early next week and coordinate with you for some time with Judge Eifert. In any event, we will not be putting a witness up on this notice on October 15, 2015. If you have any questions, please call me.

Sincerely,

Philip Combs

PHILIP J. COMBS

PJC/blm

cc: *Via E-Mail*

Christy Jones, Esquire
Ben Watson, Esquire
Rich Bernardo, Esquire
Paul Rosenblatt, Esquire
Renee Baggett, Esquire
Bryan Aylstock, Esquire
Rich Freese, Esquire